

Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR15-029RAJ

Plaintiff,

**JOINT MOTION TO RESET
BRIEFING SCHEDULE FOR
MOTION TO COMPEL**

BRIAN FARRELL,

Defendant.

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, and Defendant, Brian Farrell, by and through his counsel, Nancy Tenney, hereby move the Court as follows:

On December 11, 2015, the government produced over 200 pages of documents to the defense, including the central contract at issue, along with two affidavits, and a nine-page disclosure letter. On December 17, 2015, the parties submitted a joint motion seeking to re-set the briefing schedule for any motion to compel that might be filed to be due on January 7, 2016, with the government's response due on January 14, 2016. The bases for the brief, second continuance was for the government to complete an internal review of Department of Defense materials, and to complete a search for, and review of,

1 internal emails both for content and privilege/work product issues. On December 22,
2 2015, the Court re-set the briefing schedule as proposed by the parties.

3 The government's review of the materials described above has been completed.
4 All responsive materials have been produced to defense counsel and the government
5 anticipates that there will be no further disclosures. Although it is possible that a motion
6 to compel will still be filed, the scope of issues has considerably narrowed since the
7 status conference in this case. However, because of the need for thorough review of the
8 large volume of materials produced to defense counsel and the need for further
9 discussions between the parties, the parties respectfully suggest that the Court reset the
10 motion to compel deadline until January 25, 2016. The government's response would be
11 due on February 1, 2016 and any reply would be due by February 5, 2016. Trial in this
12 matter remains set for April 25, 2016.

13 DATED this 7th day of January, 2016.

14 Respectfully submitted:

15 ANNETTE L. HAYES
16 United States Attorney

17 /s/ Thomas M. Woods
18 THOMAS M. WOODS
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23
24 /s/ Nancy Tenney
25 NANCY TENNY
26 Attorney for Brian Farrell
Per email authorization
27
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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

/s/ Salee Porter
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